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MANYON, JOHN MICHAEL KOELLER,
16 PATRICK RYAN SEXSON, FRANCISCO
GARCIA, AUSTIN MITCHELL, AND
17 JERRALIE RENAE ORWIG

18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**

20 DYLAN RICKABY, ANDREW RAY
MANYON, JOHN MICHAEL KOELLER,
21 PATRICK RYAN SEXSON, FRANCISCO
GARCIA, AUSTIN MITCHELL, and
22 JERRALIE RENAE ORWIG

23 Plaintiff,

24 v.

25 BOOZ ALLEN HAMILTON, INC., a foreign
corporation,

26 Defendant.

Case No. 2:20-cv-02190-WBS-CKD

**JOINT STIPULATION TO CONTINUE
STATUS CONFERENCE**

Date: March 1, 2021
Time: 1:30 pm
Dept. 5

Complaint Filed: October 31, 2020
Judge: Hon. William B. Shubb

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1 **IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiffs Dylan
2 Rickaby, Andrew Ray Manyon, John Michael Koeller, Patrick Ryan Sexson, Francisco Garcia,
3 Austin Mitchell, and Jerralie Renae Orwig (“Plaintiffs”) and Defendant Booz Allen Hamilton, Inc.,
4 (“Defendant”) (collectively, the “Parties”), by and through their respective attorneys of record, as
5 follows:

6 WHEREAS, on October 31, 2021, Plaintiffs filed a Complaint for damages in this Court
7 alleging a class action against Defendant with the following causes of action (1) Pre-Employment
8 Fraud; (2) Violation of Labor Code Section 970; (3) Failure to Pay Overtime Compensation; (4)
9 Failure to Furnish Accurate Wage Statements; (5) Unfair Competition; (6) Recission of Contract;
10 (7) Failure to Allow Rest Periods; (8) Failure to Allow Meal Periods; and (9) Waiting Time
11 Penalties (the “Complaint”);

12 WHEREAS, on December 29, 2020, counsel for Defendant contacted Plaintiffs’ counsel to
13 arrange acceptance and service of the Complaint and to meet and confer regarding deficiencies in
14 Plaintiffs’ pleadings in an effort to avoid motion practice related to the same;

15 WHEREAS, on December 29, 2020, counsel for Plaintiffs’ represented that they would be
16 filing a First Amended Complaint with this court, but it was not filed;

17 WHEREAS, on February 4, 2021, counsel for Plaintiffs served the Complaint upon
18 Defendant, without amendment;

19 WHEREAS, the Parties have met and conferred and agree to continue the initial deadlines
20 until after Plaintiffs’ counsel files a First Amended Complaint;

21 WHEREAS, the Parties further agree that that they cannot currently anticipate when
22 discovery in this action could begin in earnest, and as such that scheduling discovery deadlines,
23 setting a deadline for class certification, setting trial or settlement conferences would be premature
24 at this time; and,

25 WHEREAS, the Parties agree that it would serve the interests of judicial efficiency to
26 continue the Parties’ Joint Status Report deadline by at least 60 days.

27 NOW, THEREFORE, the Parties hereby stipulate and request that the Court:

- 28 1. The Court continue the Parties’ Joint Status Report deadline by 60 days from February 12,
2021, to April 13, 2021, or whichever date is most convenient for this Court.

1 **IT IS SO STIPULATED.**

2 Dated: February 16, 2021

Respectfully submitted,

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SAMUEL AND SAMUEL

4 By: _____

Peter F. Samuel

5 Attorneys for Plaintiffs

Dylan Rickaby, Andrew Ray Manyon, John Michael
6 Koeller, Patrick Ryan Sexson, Francisco Garcia,
Austin Mitchell, and Jerralie Renae Orwig

7 Dylan Rickaby, Andrew Ray Manyon, John Michael
Koeller, Patrick Ryan Sexson, Francisco Garcia,
Austin Mitchell, and Jerralie Renae Orwig

8
9 Dated: February 16, 2021

OLETREE, DEAKINS, NASH, SMOAK, &
10 STEWART, P.C.

11 By: _____

Michael J. Nader

12 Rabia Z. Reed

13 Attorneys for Defendant

14 BOOZ ALLEN HAMILTON, INC

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ORDER

The Court, having read and considered the Parties' Joint Stipulation filed on February 12, 2020, orders the following:

1. The Court continue the Parties' Joint Status Report deadline from February 12, 2021, to April 26, 2021. The Scheduling Conference is reset for May 10, 2021 at 1:30 p.m.

IT IS SO ORDERED.

Dated: February 16, 2021

William H. Shubert

WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE

46008056.2